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August 4, 2015

By ECF

Hon. Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Linde v. Arab Bank, PLC, 04-CV-2799 (BMC)(VVP) and related cases**

Dear Judge Cogan:

We write on behalf of the *Linde* Plaintiffs with respect to certain proposed demonstrative exhibits for the upcoming trial. Plaintiffs propose to use an exemplar AK-47 rifle and several exemplar cartridges with several witnesses at trial. To this end, we have secured access to both a non-firing AK-47 rifle as well as a rubber replica of precise dimensions. As for the cartridges, we have acquired a number of 7.62x39 Orange Safety Trainer Cartridge Dummy Ammunition Ammo Shell Rounds. These are training rounds; they are not live ammunition. The purpose of these demonstrative exhibits is to illustrate certain unique characteristics of the weapons and ammunition used in the Route 60 attack that are directly relevant to the severity of the injuries suffered by the Goldstein plaintiffs.

In light of the understandable sensitivity surrounding the presence of weapons and ammunition in the courthouse, as well as applicable provisions of New York firearms laws, we seek the Court's consent to permit entry of these exhibits into the courthouse. If the Court consents, we intend to coordinate entry of these items into the courthouse with the U.S. Marshal Service. If there is a special procedure Your Honor would like Plaintiffs' counsel to follow, or if the Court would prefer that we make a proffer on FRE 402/403 grounds, we will be prepared to address those issues on August 10, or at whatever alternate time is most convenient for the Court.

Thank you for your consideration.

Respectfully submitted,
/s/ Shawn Naunton
Shawn Naunton

cc: All Counsel (via ECF)